



INSTITUTE FOR JUSTICE
TEXAS

March 25, 2024

Via Email and CM/ECF

Honorable Judge George C. Hanks, Jr.
c/o Ms. Kimberly Picota, Case Manager
United States Courthouse
515 Rusk St., Room 5300
Houston, TX 77002
Kimberly_Picota@txs.uscourts.gov

Re: Joint letter regarding trial availability pursuant to Dkt. No. 96,
Pulliam v. Fort Bend County, et al., No. 4:22-cv-4210

Honorable Judge George C. Hanks, Jr.:

Following the Court's grant in part of Defendants' Motion for Continuance of Trial (Dkt. No. 96), the parties submit this letter about the preferred date for trial.

First, we thank the Court for its diligence in scheduling this matter and for providing Plaintiff Justin Pulliam and his counsel the opportunity to consult their respective calendars. After careful review, Plaintiff respectfully requests that the Court set trial for June 13, 2025.

Defendants note that Defendant Taylor Rollins will not be available to testify on June 13th, but he will be available starting June 16th. Plaintiff will plan accordingly.

Given the proposed June 13th trial date, the parties kindly request that the Court:

1. Reset the deadline for pretrial filings to May 29, 2025; and
2. Reset the final pretrial conference to June 3, 2025, at 2:00 pm via Zoom.

We appreciate the Court's consideration of these requests and remain committed to efficiently moving this matter forward.

Respectfully,

/s/ Rolf F. Krueger

Rolf F. Krueger, of counsel
State Bar No. 24080990
Federal ID No. 3041756

Kevin T. Hedges, Attorney-in-Charge
State Bar No. 09370100
Federal ID No. 9939

Fort Bend County Attorney's Office
401 Jackson Street, 3rd Floor
Richmond, Texas 77469
(832) 471-1171
(281) 341-4557 (fax)
rolf.krueger@fortbendcountytexas.gov
kevin.hedges@fortbendcountytexas.gov

Attorneys for Defendants

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge
Texas Bar No. 24099898
Federal ID No. 3844981

Jeffrey Rowes*, of counsel
Texas Bar No. 24104956

Michael Peña*, of counsel
Texas Bar No. 24131580

INSTITUTE FOR JUSTICE
816 Congress Ave., Suite 970
Austin, TX 78701
(512) 480-5936
chebert@ij.org
jrowes@ij.org
mpena@ij.org

*Admitted *pro hac vice*

Attorneys for Plaintiff

cc: Counsel of Record